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PARALEGAL
Maria Nunez, B.S.

July 7, 2023

ENDORSEMENT

This application is denied without prejudice because defendant's counsel has failed to comply with the Court's repeated directions to submit a concrete, detailed bail proposal for the Court's consideration.

Naomi Reice Buchwald
usbj
July 11,
2023

Via ECF

Honorable Naomi Reice Buchwald
United States District Court Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States of America v. Juan Nolasco -Martinez, et al. to submit a concrete, detailed bail proposal for the Court's consideration.
22-CR-00008 (NRB)

Your Honor:

We write, at the Court's direction, in furtherance of the defendant's urgent request to be reinstated to release conditions (pre-sentence) so that he can pay respects to his Father, who passed away last week. At the Court's direction we contacted Viosanny Harrison, Mr. Nolasco's Pretrial Services Officer. As per her response dated today indicates that PTS can arrange for release conditions.

Therefore, we respectfully request that the court have Mr. Nolasco produced at the earliest convenient time and the that he be re-released to PTS on conditions. We further request that the new release conditions stay in place for a period of 7 days. The Court's consideration of this urgent request is greatly appreciated.

Thank you.

Yours truly,

John L. Russo

John L. Russo (JR6200)

Cc: AUSA Patrick Moroney (Via ECF)